United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	IDG010026	110727	C	R	3

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Simplot Land and Livestock
NPDES permit number - IDG010026
1301 Hwy 67
Grandview, ID 83624

Entry Time/Date	Permit Effective Date
7/27/2011 9:35	4/03/1997
Exit Time/Date	**Permit Expiration Date**
7/27/2011 10:45	1/07/2002

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Ron Parks, Environmental Manager
Phone (208) 455-4834
Fax (208) 455-4922

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

SIC - 0211

Name, Address of Responsible Official/Title/Phone and Fax Number

Same as above

Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☐ **Records/Reports**	☐ Compliance Schedules	☑ Pollution Prevention	
☑ Facility Site Review	☐ Laboratory	☐ Storm Water	
☐ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

RECEIVED
SEP - 1 2011
U.S. EPA REGION 10
OFFICE OF COMPLIANCE AND ENFORCEMENT

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Maria Lopez, Maria Lopez	EPA/IOO/208-378-5616	8/19/2011
Nick Peak	EPA/IOO/208-378-5765	8/23/2011
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS.
9-1-2011
MJ Brown

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B — EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L — Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

NPDES
INSPECTION REPORT

SIMPLOT LAND AND LIVESTOCK
J.R. SIMPLOT COMPANY

GRANDVIEW, IDAHO

JULY 27, 2011

Prepared by:
Maria Lopez
Idaho Operations Office
Environmental Protection Agency, Region 10

I. Facility Information

Facility Name: Simplot Land & Livestock, J.R. Simplot Company

Facility Contacts/Phone Numbers:
Ron Parks
Environmental Manager
PHONE (208) 455-4834 / FAX (208) 455-4922 / CELL (b) (6)
rparks@simplot.com

Dick Crockett
Feedlot Manager
PHONE (208) 834-2231 / FAX (208) 834-207 / CELL (b) (6)

Randy Purdy
PHONE (208) 323-5300 / CELL (b) (6)

Facility Type: Feedlot (SIC 0211)

Addresses:
Mailing: 223 Rodeo Ave., Caldwell, ID 83605

Physical: 1301 Hwy 67, Grandview, ID 83624

NPDES Number: IDG010026 (CAFO General Permit)

II. Inspection Information

Inspection Date: July 27, 2011

Inspection Time:
Arrival Time: 9:35 a.m.

Departure Time: 10:45 a.m.

Inspectors:
Maria Lopez (Lead Inspector)
Environmental Scientist
Environmental Protection Agency (EPA), Idaho Operations Office

Nick Peak
Environmental Protection Specialist
Environmental Protection Agency (EPA), Idaho Operations Office

Ralph Fisher
Senior Environmental Employee (SEE) on behalf of EPA.

AJ Maupin
Wastewater Program Lead Engineer
Idaho Department of Environmental Quality

Report Author: Maria Lopez, EPA

Inspection Type & Purpose:
Announced, Follow-up to Modified Compliance Order, Docket No. CWA-10-2010-0146. The purpose of the inspection was to determine completion of the work required per Modified Compliance Order, Docket No. CWA-10-2010-0146.

Weather: Sunny, Hot, and Dry

III. Owner Operator Information

J.R. Simplot Company, Corporation (Information obtained per the Idaho Secretary of State Viewing Business Entity)

IV. Inspection Entry

Nick Peak, EPA contacted Mr. Ron Parks to inform him of our inspection the day prior to the inspection, July 26, 2011. Mr. Peak stated to Mr. Parks that we (I, Nick Peak, and AJ Maupin) would be conducting an inspection the following morning, July 27, 2011. Nick further stated to Mr. Parks that we would meet him at the Simplot Land & Livestock facility (Facility) located at 1301 Hwy 67, Grandview, ID 83624 at 9:00 a.m. on July 27, 2011 to follow-up on the Modified Compliance Order, CWA-10-2010-0146.

The morning of July 27, 2011, I realized I had given AJ Maupin the wrong information regarding the logistics of timing. Mr. Peak called Mr. Parks and informed him that we were running approximately half an hour behind schedule.

Upon arrival at the Facility I presented my credentials to Mr. Ron Parks. Mr. Peak also presented his credentials to Mr. Parks. I introduced Mr. Maupin to Mr. Parks and informed him that he works for the Idaho Department of Environmental Quality and was accompanying EPA on the inspection for training purposes. Mr. Parks already was

familiar with Mr. Fisher. Mr. Parks asked to copy our credentials to allow us to proceed with the inspection. I stated to him that EPA is not allowed to let anyone copy our credentials for any purpose. Mr. Parks then requested a copy of our business cards, which we provided to him.

We continued to wait at the Facility's office as Mr. Parks contacted Mr. Dick Crockett, Feedlot Manager, and Mr. Randy Purdy of Feedlot Environmental Systems, Purdy Enterprises to join us. According to Mr. Parks, Mr. Purdy was the most familiar with the new process wastewater system that was installed to meet the conditions of the EPA Modified Compliance Order. Upon Mr. Crockett's and Mr. Purdy's arrival, introductions were made once again. We then proceeded to the Facility's vehicles to continue with the inspection.

V. Background

The J.R. Simplot Company (Company) operates the Simplot Land and Livestock feedlot located at 1301 Hwy. 67 in Grandview, Idaho (Facility). The Company confines more than 49,000 cattle and is a large Concentrated Animal Feeding Operation (CAFO). The Facility was issued National Pollutant Discharge Elimination System (NPDES) Permit Number IDG010026 (Permit). The permit became effective on April 3, 1997 and was administratively extended on January 7, 2002, awaiting the re-issuance of the CAFO General Permit for Idaho.

EPA sent the Company a Modified Compliance Order dated September 23, 2010 (Order). The Order was to modify the Facility's stock watering system. On February 4, 2009 EPA had issued an Information Request to the Company to obtain more information regarding the Facility's stock watering system. The Company's response to this request provided Laboratory Analysis Reports that contained results of samples taken in December 2008 and February 2009 showing high levels of coliform bacteria (1600 MPN/100mL) in the Facility's stock water. Stock water from the Facility used to discharge to irrigation canals, wetlands at the Trueblood Wildlife Refuge, and the Snake River prior to the issuance of the Order.

Mr. Parks sent EPA a letter dated March 30, 2011 informing EPA of the completion of the modification ("rebuilding") of the stock water system. According to this letter, the prior discharge from the stock water system has now stopped. The letter further states that all stock water over flow is contained on-site for stock water, and/or dust suppressant. The purpose of the July 27, 2011 inspection was to verify that the stock water system no longer discharges to irrigation canals, wetlands at the Trueblood Wildlife Refuge, and the Snake River.

VI. Waste Management Process

We began the inspection along Geo Bennett Road and stopped and looked at the first discharge pipe (Photographs 1 and 2). At the time of the inspection, water was still flowing out of the pipe. According to Mr. Parks, the source of the water was irrigation water. I asked Mr. Parks how this discharge was different from the discharge that EPA inspectors observed on their March 12, 2009 inspection. Mr. Parks stated the quantity of water coming out of the pipe now is substantially less from what the EPA inspectors observed on March 12, 2009 (50 gpm versus 1700 gpm). In addition, the irrigation water is not available in the month of March. Therefore, the discharge that was observed on March 12, 2009 was strictly stock water from the Facility.

We proceeded further north on Geo Bennett Road where Mr. Parks showed us a second pipe. Photographs 3 and 4 show this pipe, note there is no discharge from this pipe into the irrigation canal. Prior to modifications made to the stock watering system, this pipe used to discharge the overflow from the stock watering system where it would co-mingle further south on the irrigation canal with irrigation water (Photographs 1 and 2).

We then proceed to a security gate (Photograph 8) where the Facility houses the newly expanded storage pond, pumps, and control panel for the stock watering system. Mr. Purdy, technician for the computerized system, described how the system works (Photograph 10). According to Mr. Purdy, the newly installed computer system is similar in function to a Supervisory Control and Data Acquisition (SCADA) system at a drinking water plant. The operator is able to manage the water in the storage pond and use it for drinking water for cattle or dust suppression. The computerized system can be managed remotely and the technician is able to make changes and reprogram at-will. The stock water system consists of three pumps capable of 3800 gpm.

Storage Pond

The storage pond is lined and has a capacity of 3 million gallons of stock water and is between 17 – 18 feet deep which includes 3 feet of freeboard, according to Mr. Parks (Photographs 5, 6, 15, and 17). The highest level of water observed in the storage pond has been 15 feet. There is a fail-safe that touches the water in the pond if it gets to a certain level and sounds an alarm to shut down all inputs of water. According to Mr. Parks, all inputs to the storage pond are ground water sources. We noticed that the sides of the storage pond had gravel placed over the liner. According to Mr. Parks, this is to allow an individual to climb out of the lagoon in case of an accident. The perimeter of the lagoon is also fenced as a safety measure.

Use 1: Drinking Water for Cattle

The stock water in the storage pond which is used as a drinking water source for cattle is first disinfected with chlorine (Photograph 11). During our inspection, the Facility was in the process of swapping out chlorine tanks and was not using the chlorine. According to Mr. Parks, the stock tanks for drinking water need to have some quantity of water in the tanks to keep them from freezing. The stock tanks have a float to keep water in the tank at a particular level to prevent freezing during winter.

Use 2: Dust Suppression

In addition to being a drinking water source for cattle, water from the storage pond is also used for dust suppression. According to Mr. Parks, water is used at 1500 – 1800 gpm on a regular basis and runs anywhere from 3 to 12, or 15 minute cycles. The length of time of the cycles depends on the ambient temperature. For example, when temperatures get over 100 degrees Fahrenheit the frequency is reduced and the duration is increased. Mr. Parks stated that irrigation water is also used for dust suppression.

Back-up Power

According to Mr. Purdy and Mr. Parks, the Facility has a generator for back-up power (Photograph 12- 14) and shouldn't overflow. We observed a diesel tank near the storage pond. This tank is used to fuel the back-up generator in case of power outage (Photograph 16). In addition to the generator, a catch basin is located to the south of the storage pond. According to Mr. Parks, this is an additional measure in case of an overflow. However, Mr. Parks doesn't expect to ever have to use the catch basin.

VII. Scope of the Inspection

For the purpose of following up with the Order issued to the Company, I focused the July 27, 2011 inspection on improvements made to the stock watering system including, the expansion of the main storage pond, control panels for the watering system, prior points of discharge from the Facility into the Mid Line Canal. The waste management process is summarized below.

Old Stock Watering System Waste Management Process:
According to Mr. Parks, prior to the issuance of the Order, a portion of the overflow from the stock watering system used to discharge into nearby irrigation canals that flow into

the Snake River. The remaining overflow from the Facility would discharge into the Trueblood Wildlife Refuge.

Modified Stock Watering System Waste Management Process:
As required under the Order, the Company has modified its stock watering system to eliminate this discharge into the nearby irrigation canals, the Trueblood Wildlife Refuge, and the Snake River by expanding the storage pond and installing pumps and a SCADA-like system to allow the Facility to manage flows to the two uses; drink water for cattle and irrigation. According to Mr. Parks, the modification as required under the Order was completed by the Company on March 15, 2011.

VIII. Records Review

No records were reviewed on-site. However, prior to conducting the inspection on July 27, 2011, I reviewed the Order.

IX. Sample Results

No samples were collected during the inspection.

X. Receiving Water

The receiving waters that pertain to the scope of the July 27, 2011 inspection is as follows: irrigation canals (namely, the Mid-Line Canal, the wetlands to the Trueblood Wildlife Refuge, and the Snake River).

XI. Areas of Concern

For the purpose of this inspection, I focused solely on the changes made to the Facility according to the Order. As a result, I did not observe areas of concern within the content of the scope of the inspection.

Report Completion Date: 8/25/11

Lead Inspector Signature: Maria Lopez

ATTACHMENT A

Photograph Documentation

J.R. Simplot Company
Simplot Land and Livestock
Grandview, Idaho
(July 27, 2011 Inspection)

ATTACHMENT B

Aerial Map

J.R. Simplot Company
Simplot Land and Livestock
Grandview, Idaho
(July 27, 2011 Inspection)

Aerial Map No. 1

The aerial map shows the Simplot Land and Livestock facility. The existing source water pond was lined and enlarged in order to meet the Compliance Order (Order) issued by EPA to the J.R. Simplot Company on September 23, 2010.

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 1: Facing east, the photograph shows where Mr. Ron Parks of Simplot stated that the source water overflow used to discharge into a ditch, which eventually flowed to the Ted Trueblood Wildlife Reserve and the Snake River. Mr. Parks stated that the current water discharging from the pipe was irrigation water.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 2: Facing southeast, the photograph shows where Mr. Ron Parks of Simplot stated that the source water overflow used to discharge into a ditch, which eventually flowed to the Ted Trueblood Wildlife Reserve and the Snake River. Mr. Parks stated that the current water discharging from the pipe was irrigation water.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 3: Facing southeast, the photograph shows where the source water overflow was discharged into a ditch, which then mixed with the irrigation water shown in photographs 1 and 2. There was no discharge from the pipe at the time of the inspection.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 4: Facing east, the photograph shows where the source water overflow was discharged into a ditch, which then mixed with the irrigation water shown in photographs 1 and 2. There was no discharge from the pipe at the time of the inspection.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 5: Facing northwest, the photograph shows the lined storage pond that Simplot constructed to contain, treat, and recirculate the source water overflow for watering cattle, and dust suppression.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 6: Facing west, the photograph shows the lined storage pond that Simplot constructed to contain, treat, and recirculate the source water overflow for watering cattle, and dust suppression.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 7: Facing southwest: the photograph shows the lined storage pond that Simplot constructed to contain, treat, and recirculate the source water overflow for watering cattle and dust suppression. Simplot placed gravel over the synthetic liner in the top right portion of the photo to allow an individual to climb out of the lagoon in case of an accident.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 8: Facing south, the photograph shows the security gate allowing for Simplot staff or officials to enter the area where the storage pond, pumps, and computer system is housed.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 9: Facing west, the photograph was taken from the outside of a garage door into a building housing the computer control system, generator, and the pumping and valve systems for controlling and recirculating the source water overflow in the storage pond.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 10: Facing northwest, the photograph shows one of the touch screens on the computer system used for controlling and recirculating the source water overflow in the storage pond.

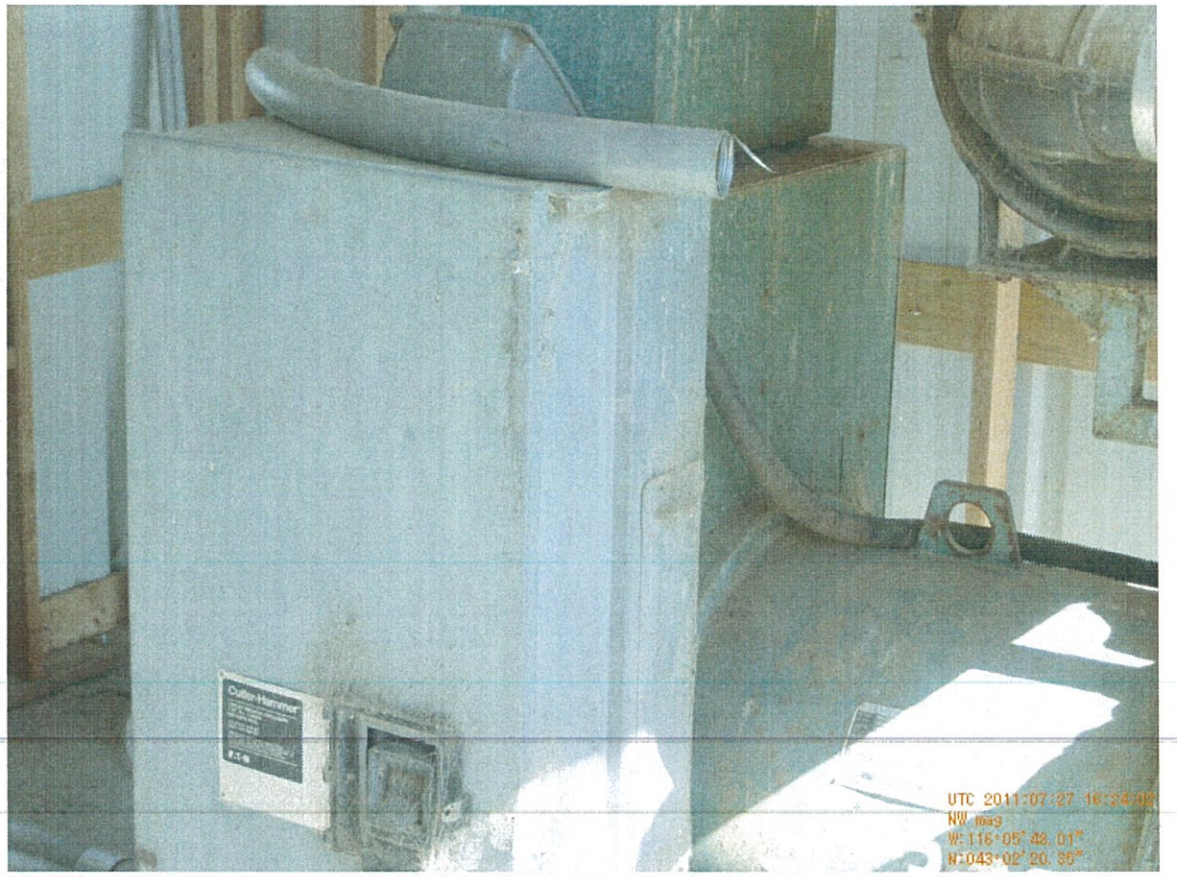
Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 11: Facing west, the photograph shows where chlorine is inserted into the recirculating source water for disinfection prior to providing the water to cattle for drinking water.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

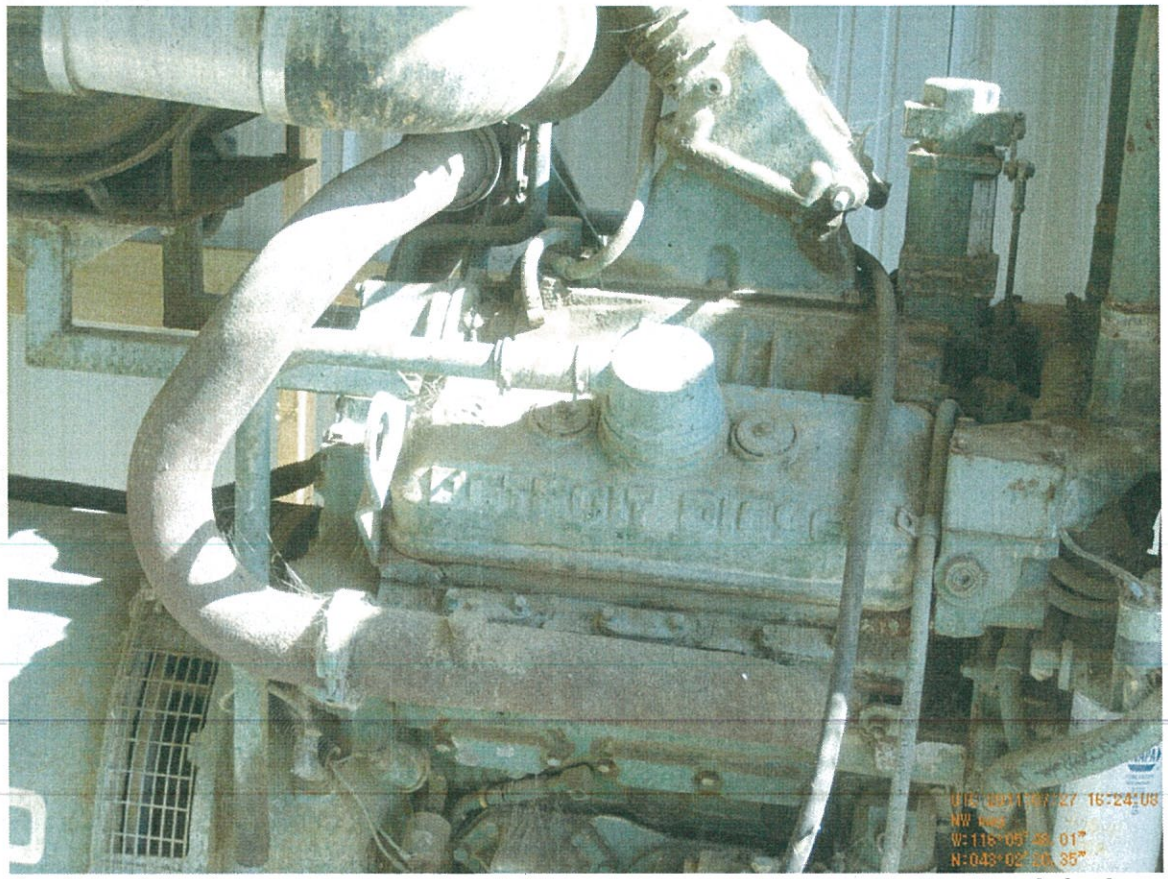
Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011



Photograph 12: Facing northwest, the photograph shows the generator used as a backup power supply for the storage pond.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011



Photograph 13: Facing northwest, the photograph shows the generator used as a backup power supply for the storage pond.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 14: Facing west, the photograph shows the generator used as a backup power supply for the storage pond.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 15: Facing northwest, the photograph shows the lined storage pond, the security fence surrounding the pond, and a diesel tank for the backup generator. Mr. Parks of Simplot stated that the diesel tank was approximately 500 gallons.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 16: Facing northwest, the photograph shows the lined storage pond, the security fence surrounding the pond, and a diesel tank for the backup generator. Mr. Parks of Simplot stated that the diesel tank was approximately 500 gallons.

Photographs taken by Nick Peak, EPA, Idaho Operations Office

Simplot Land and Livestock
1301 Hwy 67, Grand View, ID
Inspection Photo Log
July 27, 2011

Photograph 17: Facing northwest (note error in photograph states that the photograph is facing northeast), the photograph shows the lined storage pond that Simplot constructed to contain, treat, and recirculate the source water overflow for watering cattle and dust suppression. Simplot placed gravel over the synthetic liner in the top right portion of the photo to allow an individual to climb out of the lagoon in case of an accident.

Photographs taken by Nick Peak, EPA, Idaho Operations Office